

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

HERITAGE GUITAR, INC.,)	
)	
Plaintiff,)	
)	Case No. 20-cv-229
vs.)	
)	Honorable Hala Y. Jarbou
GIBSON BRANDS, INC.,)	
)	Magistrate Judge Ray Kent
Defendant.)	
)	

**DEFENDANT’S PARTIAL MOTION TO DISMISS
PLAINTIFF’S SECOND AMENDED COMPLAINT**

Pursuant to Fed. R. Civ. Pro. 12(b)(6) and 28 U.S.C. § 1404, Defendant Gibson Brands, Inc. (“Gibson”), by and through its counsel, hereby moves for an order granting its Partial Motion to Dismiss Plaintiff’s Second Amended Complaint. In accordance with Local Rule 7.1(d), on December 22, 2021 and December 23, 2021, Defendant’s counsel conferred with Plaintiff’s counsel regarding the Partial Motion to Dismiss. Plaintiff’s counsel advised that they will be opposing the motion.

WHEREFORE, Defendant respectfully requests that this Court grant its Partial Motion to Dismiss Plaintiff’s Second Amended Complaint.

Dated: December 23, 2021

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Attorneys for Defendant

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CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2021, I electronically filed the foregoing paper with the Clerk of Court using the ECF system, which will send notification of such filing to counsel of record.

Dated: December 23, 2021

BATES & BATES, LLC
Attorneys for Defendant

/s/ Andrea E Bates
Andrea E. Bates